Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

In the Matter of	)	
	)	
Amendment of the Commission's Rules to Promote Aviation Safety	)	WT Docket No. 19-140
	)	
WiMAX Forum Petition to Adopt Service Rules for the Aeronautical Mobile Airport Communications System (AeroMACS)	)	RM-11793
	)	
Petition of Sierra Nevada Corporation for Amendment of the Commission's Rules to Allow for Enhanced Flight Vision System Radar under Part 87	)	RM-11799
	)	
Petition of Aviation Spectrum Resources, Inc. for Amendment of Sections 87.173(b) and 87.263(a) of the FCC's Rules to Allow Use of the Lower 136 MHz Band by Aeronautical Enroute Stations	)	RM-11818
	)	
Petition of Airports Council International-North America Regarding Aeronautical Utility Mobile Stations	)	RM-11832

REPLY COMMENTS OF COMSEARCH

Comsearch, a CommScope company,[1] hereby files its reply comments in the above-captioned proceeding.[2]

Comsearch has an over 40-year history as a frequency coordinator. Below is a brief listing that highlights some of our service areas:

[1] Comsearch is a business unit within the Integrated Solutions/CommScope Mobility Solutions division of CommScope (NASDAQ: COMM). CommScope helps companies around the world design, build and manage their wired and wireless networks. Our vast portfolio of network infrastructure includes some of the world's most robust and innovative wireless and fiber optic solutions. Our solutions can be found in the largest buildings, venues and outdoor spaces; in data centers and buildings of all shapes, sizes and complexity; at wireless cell sites; in telecom central offices and cable headends; in FTTx deployments; and in airports, trains, and tunnels.

[2] See *In the Matter of Amendment of the Commission's Rules to Promote Aviation Safety*, WT Docket No. 19-140, 34 FCC Rcd 4984 (6), Notice of Proposed Rulemaking (NPRM)

- An FCC-certified Spectrum Access System and Environmental Sensing Capability (SAS/ESC) administrator for the Citizens Broadband Radio Service.[3]
- Support the American Society for Healthcare Engineering (ASHE) of the American Hospital Association (AHA) as the WMTS frequency coordinator.[4]
- Also supported ASHE in their bid to become the Medical Body Area Network Service (MBANS) frequency coordinator.[5]
- The leading frequency coordinator for commercial microwave systems in the United States.
- An FCC-certified 70-80-90 GHz Link Registration Database Administrator.[6]

We have developed numerous software products to address the engineering challenges of network planning, spectrum management, and spectrum administration, band sharing, incumbent relocation, and spectrum administration.

We support the extensive number of comments suggesting that the FCC designate a single nationwide channel manager.[7] We concur with the Commission's comparison of

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[3] See *Wireless Telecommunications Bureau and Office of Engineering and Technology Approve Five Spectrum Access System Administrators to Begin Initial Commercial Deployments in the 3.5 GHz Band*, GN Docket No. 15-319.

[4] See *Amendment of Parts 2 and 95 of the Commission's Rules to Create a Wireless Medical Telemetry Service, "Designated the American Society for Health Care Engineering of the American Hospital Association to serve as the frequency coordinator for the Wireless Medical Telemetry Service"*, ET Docket 99-255, 16 FCC Rcd 4543 (2001).

[5] See *Amendment of the Commission's Rules to Provide Spectrum for the Operation of Medical Body Area Networks*, ET Docket 08-59, 30 FCC Rcd 1173 (2). ASHE subsequently declined the selection.

[6] See *Allocations and Service Rules for the 71-76 GHz, 81-86 GHz and 92-95 GHz Bands*, WT Docket No. 02-146, 18 FCC Rcd 23318 (2003); *Wireless Telecommunications Bureau Opens Filing Window For Proposals To Develop And Manage Independent Database Of Site Registrations By Licensees In The 71-76 GHz, 81-86 GHz and 92-95 GHz Bands* (DA 04-672).

[7] See, for example WiMAX Forum comments at p10, ASRI comments at p8, Telrad Networks comments at p1, Boeing comments at p12, etc.

AeroMACS coordination to the WMTS and MBANS coordination approaches.[8] At the time, the Commission's rationale for selecting a single frequency coordinator for WMTS was:[9]

> "…we believe that designating a single WMTS frequency coordinator will simplify the coordination process, reduce the costs of coordination, and expedite the deployment of wireless medical telemetry equipment. A single centralized database is easier to maintain than multiple databases, and gives medical telemetry equipment users and manufacturers a single point of contact to obtain all of the information they need regarding potential frequency conflicts. If there were multiple coordinators, moreover, there would have to be a high degree of cooperation among them, and significant effort would have to be undertaken to ensure that each coordinator, at all times, has a complete database; any lapses in communication among coordinators could result in harmful interference to medical telemetry operations, thereby potentially jeopardizing patient care."
>
> "…we do not anticipate that multiple WMTS frequency coordinators would directly spur a competitive environment that would produce an acceptable speed of service. Finally, we are concerned that compared to a single coordinator, a multiple coordinator scheme could result in higher coordination costs, and hence higher coordination fees, because the costs incurred by any given coordinator would be spread across a smaller base of users and each coordinator would incur additional costs necessitated by the existence of other coordinators. In light of these considerations, we conclude that it is appropriate to designate a single WMTS frequency coordinator, at least initially."

The Commission used similar rationale for selecting the MBANS coordinator.[10]

We suggest the Commission could issue a Public Notice seeking proposals from interested parties in becoming the nationwide Channel Manager similar to any of the examples provided herein.

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[8] NPRM at ¶37.

[9] See *Amendment of Parts 2 and 95 of the Commission's Rules to Create a Wireless Medical Telemetry Service*, ET Docket 99-255, 16 FCC Rcd 4543 (7) at ¶21.

[10] See *Amendment of the Commission's Rules to Provide Spectrum for the Operation of Medical Body Area Networks*, ET Docket No. 08-59, 30 FCC Rcd 1173 (2)

Respectfully submitted,

/s/ H. Mark Gibson

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